

1 ROBERT K. PHILLIPS
2 Nevada Bar No. 11441
3 BETSY C. JEFFERIS
4 Nevada Bar No. 12980
5 **PHILLIPS, SPALLAS & ANGSTADT LLC**
6 504 South Ninth Street
7 Las Vegas, Nevada 89101
8 (702) 938-1510
9 rphillips@psalaw.net
10 bjefferis@psalaw.net

11 *Attorneys for Defendant*
12 *Sam's West, Inc.*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 KEVIN BROWN, an individual,

16 Plaintiff, Case No.: 2:15-cv-01964-LDG-CWH

v.

17 SAM'S WEST, INC.; ADVANTAGE SALES
18 AND MARKETING, LLC; and DOES 1
19 through 100;

STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE DATE TO
FILE PRE-TRIAL ORDER [FIRST]
REQUEST]

20 Defendants.

21 WHEREAS, pursuant to the order of this Court (Doc. #93), the parties were to file a Joint Pretrial
22 Order on or before April 20, 2018; and

23 WHEREAS, on February 12, 2018, the Court ordered that Defendant Sam's West can conduct
24 limited discovery as to the loss of consortium claim brought by Plaintiff Jennifer Brown in the matter
25 including re-deposing Jennifer Brown on the loss of consortium claim and disclosing an expert
26 witness, if necessary, and the parties wish to utilize this information in preparation of the Joint
27 Pretrial Order;

28 WHEREAS, the parties are currently engaging in settlement negotiations to resolve this matter in
its entirety. Given these discussions, and in order to avoid potentially unnecessary additional fees
and costs if this matter settles, the parties stipulate to extend the deadline for the Joint Pre-Trial
Order.

1 IT IS HEREBY STIPULATED AND AGREED by and between Betsy C. Jefferis, Esq. of the law
2 firm of PHILLIPS, SPALLAS & ANGSTADT LLC, Attorneys for Defendant Sam's West, Inc. and
3 R. Todd Terry, Esq. and Keely A. Purdue, Esq. of CHRISTIANSEN LAW OFFICES, Attorneys for
4 Plaintiffs Kevin and Jennifer Brown, as follows:

5 That the deadline for filing the Joint Pretrial Order be extended to June 19, 2018.

6 Respectfully submitted on this 11th day of April, 2018, by:
7

8 **CHRISTIANSEN LAW OFFICES**
9 */s/ Keely A Purdue*

10 KEELY A. PURDUE, ESQ.
11 Nevada Bar No. 13931
12 801 S. Casino Center Blvd.
13 Las Vegas, NV 89101
14 (702)-240-7979

15
16 *Attorneys for Plaintiff
17 Kevin Brown*

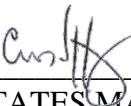
PHILLIPS, SPALLAS &ANGSTADT, LLC
/s/ *Betsy C. Jefferis*

BETSY C. JEFFERIS, ESQ.
Nevada Bar No. 12980
504 South Ninth Street
Las Vegas, Nevada 89101
(702) 938-1510

*Attorneys for Defendant
Sam's West, Inc*

18 **IT IS SO ORDERED.**

19 Dated this 12th day of April, 2018.
20

21 
22 UNITED STATES MAGISTRATE JUDGE
23

24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April, 2018, I served a true and correct copy of the foregoing, **STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DATE TO FILE PRE-TRIAL ORDER [FIRST REQUEST]**, by facsimile and by U.S. Mail, in a sealed envelope, first-class postage fully prepaid, addressed to the following counsel of record, at the address listed below:

ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
PETER S. CHRISTIANSEN, ESQ. Nevada Bar No. 5254 CHRISTIANSEN LAW OFFICES 801 S. Casino Center Blvd. Las Vegas, Nevada 89101	Phone 702-240-7979 Fax 866-412-6992	Plaintiff

/s/ *Betsy C. Jefferis*

An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC